

August 21, 2014

Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly

Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: MB Docket No. 14-57

Dear Chairman Wheeler and Commissioners:

We write to share the perspective of some of America's cities on the proposed transaction between Time Warner Cable and Comcast. Each of us represents a city that has worked with one of these companies and knows them to be stalwart community partners who contribute to, and invest in, the communities in which they do business.

The combination of these two American companies will bring benefits to every affected city. Cities joining the Comcast service area will benefit from increased network investment, faster Internet speeds, improved video options and leading community development programs to help us tackle important community challenges like the digital divide. Existing Comcast markets will enjoy the benefits of a company with the scale and scope to invest in innovation and deliver products and services on a regional basis.

For us, the most significant aspect of the proposed transaction is its capacity to propel new investment in infrastructure in Time Warner markets that will enhance video and Internet service in our communities. Comcast has pledged to invest hundreds of millions of dollars a year speeding up and improving the combined company's networks.

We also view positively the apparent response to this development from other companies that provide similar services. Since the Comcast Time Warner Cable transaction was proposed, Google has announced plans to expand its high-speed Fiber service to 34 new communities,<sup>1</sup> AT&T has announced plans to expand its 1 gigabit U-Verse service to 100 new municipalities including 21 large cities,<sup>2</sup> and Sprint's corporate parent has proposed to build a 200 Mbps wireless network for the US.<sup>3</sup> These investments, and more like them, are critical to our communities and should be

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<sup>1</sup> [Google Fiber, Ultrahigh-Speed Internet, May Expand to 34 New Cities, 2/19/14.](#)

<sup>2</sup> [AT&T Eyes 100 U.S. Cities and Municipalities for its Ultra-Fast Fiber, 4/21/14.](#)

<sup>3</sup> [SoftBank's Son vows broadband speeds of 200 Mbps, more competition in U.S. market, 3/11/14.](#)

strongly encouraged – as this transaction does. In other words, we believe that the benefit to our communities is even larger than the expanded investments of the two particular companies involved.

This merger is unique in that Comcast and Time Warner Cable do not compete in any market so this transaction not only will avoid any loss of consumer choice but also will create a stronger, larger competitor in the marketplace that should bring new choices to our citizens. Comcast has proven to be a technology leader, offering the fastest residential speeds, the most high-definition television channels, the greatest number of mobile video options, and the X1 Platform – Comcast’s next generation interactive entertainment operating system. For businesses, especially in larger cities, a new national choice for phone and Internet service is especially valuable for economic growth and innovation. Competition promises lower prices and faster speeds: Comcast currently serves business customers with speeds as high as 10 Gbps, making the markets they serve more attractive to current and prospective employers.

Most importantly, we believe the transaction will boost our efforts to close the digital divide and encourage broadband adoption. Comcast’s Internet Essentials program is a model effort to address this stubborn problem and has already helped more than 1.4 million Americans access home broadband. Internet Essentials works because it partners with local organizations on the front lines in our cities, from major national organizations like Khan Academy, the National Urban League and the Boys and Girls Club to truly local community-based organizations. Internet Essentials doesn’t simply serve our communities – it becomes part of them.

The transaction would strengthen and expand this effort in 16 of the 20 largest cities in the country, an unequivocal benefit to those communities. Expanded broadband adoption and increased digital literacy in our workforce will, in turn, bolster our overall economies. Research shows that communities with strong technology and information economies recovered far more quickly from the last recession than those without.<sup>4</sup> And a technology-educated workforce is critical as we compete to attract and retain innovative new businesses to our cities.

Time Warner Cable has been a responsible corporate citizen whose efforts will only be enhanced by joining forces with Comcast’s community investment programs. Comcast has established itself as an industry leader and exemplary community partner who invests in its local communities and works hand in hand with local governments on critical social challenges like the digital divide.

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<sup>4</sup> [The PPI Tech/Info Job Ranking, October 2013.](#)

We understand the Commission must weigh a number of factors when considering this type of transaction, and we do not take a position on them all. However, from our perspective, the increased investment, improved services, and community commitments that Comcast and Time Warner Cable have made all weigh heavily in favor of the proposed transaction.

Sincerely,



Michael A. Nutter  
Mayor  
Philadelphia, Pennsylvania



C. Kim Bracey  
Mayor  
York, Pennsylvania



Joe Riley  
Mayor  
Charleston, South Carolina



Stephen K. Benjamin  
Mayor  
Columbia, South Carolina



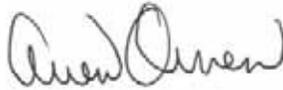
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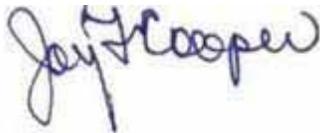
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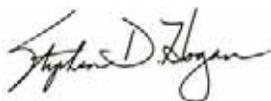
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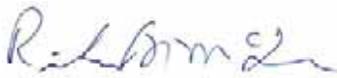
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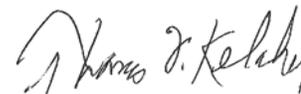
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